

# Exhibit 13

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 SAN FRANCISCO DIVISION

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6 In Re: CATHODE RAY TUBE (CRT) )  
7 ANTITRUST LITIGATION, )  
8 Plaintiff, ) Case No.  
9 \_\_\_\_\_ ) 07-5944 Sc  
This Document Relates to: ) MDL No. 1917  
10 ALL ACTIONS, )  
11 \_\_\_\_\_ )

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14  
15 VIDEOTAPED DEPOSITION OF BARRY KUSHNER

16 FRIDAY, MARCH 2, 2012

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25 REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 Q. Mr. Kushner, in your own words, please  
2 describe the claim or claims that you are asserting  
3 in this case.

4 A. I'm asserting that due to price-fixing, I  
09:02 5 actually paid more for my CRT TVs than I should  
6 have paid.

7 Q. What is a cathode ray tube?

8 A. CRT, cathode ray tube.

9 Q. Do you know anything about a CRT other  
09:02 10 than its name?

11 A. No.

12 Q. Okay. Throughout this deposition, I am  
13 going to refer to cathode ray tubes, as you did, as  
14 CRTs, okay?

09:03 15 A. Fine.

16 Q. What type of products contain CRTs?

17 A. Televisions, computer monitors.

18 Q. Anything else?

19 A. Not to my knowledge. I am sure there are.

09:03 20 Q. Have you ever personally purchased a CRT?

21 A. Well, yes.

22 Q. Let me clarify. Have you ever personally  
23 purchased a CRT standing alone?

24 A. No.

09:03 25 Q. Have you ever personally purchased a

1       Toshiba television was manufactured by someone  
2       other than a defendant or an alleged coconspirator?

3                    MR. GRALEWSKI: Object to the form of the  
4       question. Calls for speculation. Lacks  
09:41 5       foundation.

6                    THE WITNESS: Possible.

7       Q. BY MS. DONOVAN: Do you know the price  
8       that Toshiba paid for the CRT inside your  
9       television?

09:42 10      A. No.

11      Q. Do you know where the CRT inside your  
12     television was manufactured?

13      A. No.

14      Q. Do you know where the Toshiba television  
09:42 15     was manufactured?

16      A. No.

17      Q. And do you know where Toshiba obtained the  
18     CRT inside your television?

19      A. No.

09:42 20      Q. And if asked by your counsel, would you be  
21     willing to open your television to determine if it  
22     contains a CRT manufactured by a defendant in this  
23     case and/or to determine the size of the CRT  
24     contained in your television?

09:42 25      A. Yes.